

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

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v.

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**WAYNE EARL JENKINS,**

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**DANIEL THOMAS HERSL,**

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**and**

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**MARCUS ROOSAVELT TAYLOR**

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**Criminal No. 1:17-cr-106-CCB**

**CONSENT JOINT MOTION TO ENLARGE TIME WITHIN WHICH  
TO FILE PRETRIAL MOTIONS**

COMES NOW, Defendant Daniel Thomas Hersl, by and through undersigned counsel, and respectfully requests that this Court enlarge the filing time for pretrial motions for one week, until October 13, 2017. In support of this Motion, counsel states:

1. Counsel has been diligently reviewing voluminous discovery, conducting research, and otherwise preparing pretrial Motions in this case.
2. Motions are currently due to be filed today, October 6, 2017.
3. Due to ongoing negotiations between Mr. Hersl and the Government, however, counsel requests one additional week in which to file. Counsel for Mr. Jenkins and Mr. Taylor join this request.
4. Counsel for the Government, AUSA Leo Wise, has advised the undersigned that he consents to this Motion.

WHEREFORE, Mr. Hersl respectfully requests that this Court enlarge filing time for

Motions in this matter until October 13, 2017.

Respectfully submitted,

/s/

William B. Purprura  
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**ORDER**

Upon consideration of the Consent Joint Motion to Enlarge Time Within Which to File Pretrial Motions, and for good cause show, it is this \_\_\_\_\_ day of \_\_\_\_\_ 2017, hereby ORDERED that the motion is granted and the new deadline for defense motions is October 6, 2017.

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Judge Catherine C. Blake